

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2006-327-WS**

IN RE:

Petition of the Office of Regulatory Staff	)	
Regarding Wyboo Plantation Utilities,	)	
Incorporated's Collection and Charging of	)	<b>Office of Regulatory Staff's Second</b>
<u>Unauthorized and Unapproved Rates</u>	)	<b>Continuing Data Request</b>

**TO: WYBOO PLANTATION UTILITIES, INC. ("Wyboo" or "the Company")**

**INSTRUCTIONS**

The South Carolina Office of Regulatory Staff ("ORS") hereby requests, pursuant to 26 S.C. Code Regs. 103-833 (Supp. 2007), that the Company answer the following data requests in writing and under oath and serve the undersigned within twenty (20) days after service of this data request to ORS at 1401 Main Street, Suite 900, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, title, current address and telephone number of the person. When asked to identify or provide a document, "identify" and "provide" mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to,

statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings. As used in this data request, "address" means mailing address and business address.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS HEREIN REQUESTED:

- A. That all information shall be provided to the undersigned in the format as requested.
- B. That all responses to the requests below be labeled using the same numbers as used herein.
- C. That each of the enumerated data requests be reproduced at the beginning of each of the responses.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the data request in the appropriate sequence.
- E. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.
- F. That all exhibits be reduced to 8 ½" x 11" format, where practical.
- G. That the requested information be bound in ring binders (loose leaf notebooks) or otherwise suitably bound.
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each response be indicated.
- I. That the Company provide to ORS two copies of the responses to this data request as soon as possible but no later than twenty (20) days after service thereof.

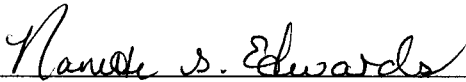
- J. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- K. This data request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.

### **DATA REQUESTS**

- 2.1 Provide the amount of accrued interest on customer deposits as of January 1, 2007 and December 31, 2007.
- 2.2 Provide information on the amount of deposits and interest returned to customers during 2006, 2007, and 2008 and any amount provided to the State of South Carolina pursuant to the Unclaimed Property Act.
- 2.3 Provide copies of cancelled checks written by Wyboo Plantation Utilities, Inc. showing the return of security deposits to customers in 2006, 2007, and 2008.
- 2.4 Provide a copy of the monthly bank statements showing the itemized security deposits/credits and withdrawals/debits in 2005 for the bank account(s) used to manage the customer security deposits.
- 2.5 Provide copies of all existing and proposed special contracts binding Wyboo to a third party. Special contracts would include but not be limited to contracts for maintenance, construction agreements, rate agreements, system ownership, loan agreements, and future tap commitments.
- 2.6 Has the loan agreement with Mr. Doug Rhodes been fulfilled? Please explain.
- 2.7 Provide a copy of any and all loan agreements or other documents evidencing indebtedness of the Company, its applicable amortization schedule, and any other relevant documentation.
- 2.8 Submit detailed working papers breaking down the revenue of Wyboo Plantation Utilities, Inc. for 2007 (i.e., ledger sheets, etc.). Include information about the schedule for the revenues generated that are separate from normal monthly charges. The revenue information provided in response to data request number 1.9 is inconsistent with the revenue information included in the 2007 annual report. Please explain why the two documents have different revenue numbers for the same period.
- 2.9 List the Wyboo Plantation Utilities, Inc. assets pledged for any loans.

- 2.10 Provide copies of the customer account history showing the return or credit of any overcharges (i.e., tap fees, cut-on fees, cut-off fees, DHEC sewer fees, impact fees, etc.) that was returned to customers in 2006, 2007, and 2008.
- 2.11 For those customers provided a refund for overcharges, submit a copy of the cancelled checks along with a copy of the corresponding monthly checking account statement showing the disposition of the check. Also, provide copies of appropriate documentation showing the customer's agreement to have their account credited versus a refund of the overcharge as allowed pursuant to Commission Regulations 103-533 and 103.733.2.

October 15, 2008

  
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Nanette S. Edwards, Esquire  
C. Lessie Hammonds, Esquire  
**South Carolina Office of Regulatory Staff**  
1401 Main Street, Suite 900  
Columbia, South Carolina 29201  
Phone: 803-737-0800  
Facsimile: 803-737-0895

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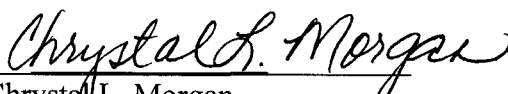
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**CERTIFICATE OF SERVICE**

This is to certify that I, Chrystal L. Morgan, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **SECOND CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

Mark S. Wrigley, CEO  
Wyboo Plantation Utilities, Incorporated  
Post Office 2099  
Sumter, SC, 29151

Richard L. Whitt, Esquire  
Austin & Rogers, P.A.  
Post Office Box 11716  
Columbia , SC, 29201

  
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Chrystal L. Morgan

October 15, 2008  
Columbia, South Carolina